



VIA EMAIL COMMUNICATION

September 29, 2014

Ms. Patricia Scott
Mr. Terry Andrews
Texas Commission of Environmental Quality (TCEQ)
P.O. Box 13087
Austin, TX 78711-3087

**Re: CES Environmental Services Inc. Facility
4904 Griggs Road, Houston, Harris County, Texas – SWR # 30900**

Dear Mr. Andrews and Ms. Scott:

This letter is sent on behalf of The Lubrizol Corporation, Afton Chemical Corporation, Afton Chemical Additives Corporation, Ethyl Corporation, Bayer MaterialScience LLC, Momentive Specialty Chemicals Inc. (Interested Companies) and is in response to the TCEQ's request for information regarding the CES Environmental Services Inc. facility located at 4904 Griggs Road in Houston (the "Site").

While the TCEQ request for information sought a request for responsive documents, it is our understanding that one or more of the aforementioned companies may have independently contacted TCEQ seeking an extension regarding the production of records and information. Note that this letter does not affect any arrangements made by the individual Interested Companies and is not intended to address document production matters.

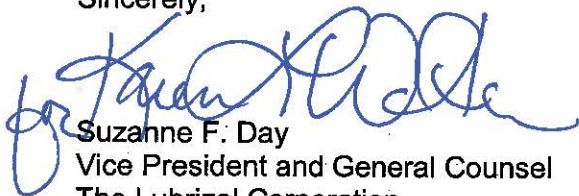
The TCEQ also has asked whether the Interested Companies would be willing to fund or conduct TCEQ-approved cleanup activities at the Site such as removals, investigations, or remedial actions. The Interested Companies may be willing to do so. However, Interested Companies do not have enough information about the Site or the anticipated cleanup activities to make an unequivocal statement of willingness.

Therefore, Interested Companies would like to propose a meeting with the TCEQ technical and legal representatives to ask questions regarding: the information that the TCEQ has collected regarding PRPs at the Site, the regulatory and other history of the Site, what cleanup activities the TCEQ anticipates will be necessary, what standards will be applicable to the Site, and what programs are available for the cleanup activities. Interested Companies are also interested in learning about the involvement, if any, of the US EPA and the bankruptcy trustee for CES Environmental Services Inc. in the anticipated cleanup activities. Interested Companies share the TCEQ's desire to proceed as rapidly as possible, and therefore would be available for this meeting within the next two weeks.

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Interested Companies look forward to learning more about the Site, and to cooperating with the TCEQ. If the TCEQ is willing to have the requested meeting, please call Karen Walter at (440) 347 – 5028 to discuss meeting participants and available dates and times.

Sincerely,



Suzanne F. Day
Vice President and General Counsel
The Lubrizol Corporation

cc: C. Amin, Bayer
S. Couhig, Momentive
K. Kirkeby, Afton and Ethyl